



# MRA Tips for Licensees

November 4, 2020

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## Common Issues

The Marijuana Regulatory Agency is advising marijuana businesses of common issues regarding retesting/testing status, labeling requirements, and strain specificity (mixing strains).

### Retesting/Testing Status

The promulgation of the administrative rules on June 22, 2020 permits retesting and remediation of failed product. This allows licensees to maintain more product within the market and limits the need for product destruction. However, there has been some confusion regarding how Metrc tracks and records results for products that failed initial compliance testing. When a safety compliance facility enters subsequent results, Metrc will not default to the most current test but rather requires a verification by the MRA to override the initial, failing results. This is a safety measure that the MRA uses to ensure products have undergone the necessary tests whenever product is remediated or retested. Licensees should be familiar with this information and recognize that anytime a product is submitted for retesting, the results will not be updated within Metrc immediately upon entry, but will have to complete the approval process before they are updated.

### Labeling

All businesses should review the marijuana product label before accepting it into their inventory. In the event that the labeling is incorrect, the provisioning center/retailer should reject the package and request that the grower/processor label the products compliantly. If the provisioning center/retailer mistakenly accepts a package that is not compliantly labeled, the originating facility must relabel the product.

The labeling must follow **Rule 4(1) in the Marihuana Sale or Transfer - R 420.504**

The label must include but is not limited to the Date of Harvest (flower), testing facility, test date, originating facility, packaging facility if different than the originating facility, tag, strain name, warning labels, Net weight in United States customary and metric units, universal symbol for marijuana, activation time, and Concentration of Tetrahydrocannabinol (THC) and cannabidiol (CBD) as reported by the laboratory after potency testing along with a statement that the actual value may vary from the reported value by 10%.

Edibles are also required to follow **Rule 3(7) Marihuana-Infused Products and Edible Marihuana Product – R 420.403(7)**.

*This Tips bulletin does not constitute legal advice and is subject to change. Licensees are encouraged to seek legal counsel to ensure their operations comply with all applicable laws and rules.*



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All labels must be affixed to the physical product and the full Metrc ID must be visible. Marijuana products must be labeled, such as sniff jars, product in display cases, etc.

THC levels must be accurate and represent the actual tested THC level. THC levels cannot be a rounded number or projected target number. Labels for edibles should accurately identify the serving size. It is also good practice to ensure the packages have dosing instructions.

## **Mixing Strains**

Licensed growers are permitted to submit requests for extraction to bypass the sampling and testing requirement of harvest batches if they intend to convert the plant material into extracted material. Products manufactured from the extraction process are required to be tested in final state and testing in various production stages is encouraged, but not required. Extraction is also permitted as a form of remediation for failed product.

The only time mixed marijuana strains are permitted is under an approved extraction request process.

Marijuana strains must be labeled with the harvest batch, testing date, and results. Mixing of strains for any flower (bud, shake, trim) would not allow proper labeling and is in violation of the administrative rules.

Mixing strains and calling it “house shake” is not permitted. If flower is mixed or when creating pre-rolls, all products must be harvest batch, strain, and testing date specific. Licensees may not mix strains even if they are strain specific as it needs to meet all the labeling requirements. Labeling requirements can be found in **Rule 4(1) in the Marijuana Sale or Transfer - R 420.504**

Questions can be sent to the Marijuana Regulatory Agency Operations Support Section via email at [MRA-Compliance@michigan.gov](mailto:MRA-Compliance@michigan.gov)

For more information about the Marijuana Regulatory Agency, please visit [www.michigan.gov/MRA](http://www.michigan.gov/MRA)